



September 27, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

*Re: Use of Spectrum Bands Above 24 GHz for Mobile Radio Services, et. al., GN*  
**Docket No. 14-177, IB Docket No. 15-256, RM-11664, WT Docket No. 10-112, IB**  
**Docket No. 97-95**

Dear Ms. Dortch:

We write to encourage the Federal Communications Commission to move quickly to finalize sharing rules for the 37-37.6 gigahertz band. Engine is a research and advocacy organization that works to give a voice to the country's startup ecosystem by connecting entrepreneurs with policymakers and advocating for pro-startup policies. As such, we recognize the potential for promoting Internet access, innovation, and economic activity by finalizing sharing rules and allowing unlicensed use in the 37-37.6 gigahertz band.

Finalizing sharing rules in this space will make available more much-needed spectrum for unlicensed use, which will open up opportunities for those who want to use the high-frequency unlicensed spectrum to provide innovative offerings in the broadband access market. Further, facilitating the deployment of those innovative offerings will increase broadband access generally, allowing more people to have access to the Internet and the level playing field it provides for startups.

Unlicensed spectrum is particularly useful for new and small startups because it has a much lower barrier to entry than the high cost of licensed spectrum, which incumbents can often afford to pay. Unlicensed spectrum also plays a critical role in the constantly-evolving world of connected devices and the Internet of Things, a space where innovative startups have typically thrived.

The FCC should promptly finalize sharing rules to realize the vision laid out in the Further Notice of Proposed Rulemaking last year to “promote access to spectrum by a wide variety of entities, support innovative uses of the band, and help ensure that spectrum is widely utilized.”

Like then-Commissioner Pai, we were also “glad that [the FCC was] ... placing an even greater emphasis on fostering investment and innovation in the millimeter wave bands” when it adopted the Spectrum Frontiers Report and Order and FNPRM in 2016. Opening up more spectrum for unlicensed use on a shared basis will increase the opportunity for new, innovative, and efficient uses of this critical resource.

Respectfully submitted,

Engine Advocacy